

North Carolina Department of Environment and Natural Resources

Pat McCrory Governor Donald R. van der Vaart Secretary

March 26, 2015

Mr. Curtis R. Michols Abbott Laboratories Dept. D0539, Bldg. AP52-S 200 Abbott Park Road Abbott Park, IL 60064212

RE: Review of Work Plan for Supplemental RI Abbott Labs, Hwys 401 and 15/501 Laurinburg, Scotland County, NONCD 000 040

Dear Mr. Michols:

This is in response to the Work Plan for Supplemental Remedial Investigation (Work Plan) received on February 27, 2015. Please note that all comments related to this Work Plan are specific only to addressing the chlorinated solvent release that is under the regulatory jurisdiction of the Inactive Hazardous Sites Branch (Branch). All work related to the fuel oil release is under the regulatory jurisdiction of the UST Section and should be done in accordance with their requirements.

With regard to my review of the Work Plan, this document appears to be complete and addresses most of the potential data gaps that were identified in order to evaluate this Site for potential eligibility under the Risk-Based Environmental Remediation of Industrial Sites rule (aka "the risk-based remediation rule"). While the land use restrictions that are in-place under the Brownfields Program will likely be adequate for a risk based cleanup of this Site, the current land owner would likely need to grant permission to Abbott Labs prior to implementing the risk-based remedial action.

To avoid performing unnecessary work, please submit the additional data collected from this Work Plan for our review prior to conducting any additional work on the Remedial Action Plan Addendum (proposing the risk-based cleanup) for this Site.

If you have any questions or concerns, please feel free to contact me at 910.433.3343 or email me at: sean.boyles@ncdenr.gov

Sincerely,

P. Sean Boyles, PG

Hydrogeologist

Fayetteville Regional Office

Inactive Hazardous Sites Branch

cc: S. Grant Watkins, PG, RSM, ERM NC, Inc., 1130 Situs Court, Suite 250, Raleigh, NC 27606 John Walch and Ken Currie, NCDENR